



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

FILED

6-21-16
04:59 PM

Application of Pacific Gas and Electric Company)
For Authority, Among Other Things, to Increase)
Rates and Charges for Electric and Gas Service)
Effective January 1, 2017 (U 39 M))
_____)

Application 15-09-001
(Filed September 1, 2015)

**REPLY TO JOINT MOTION TO EXTEND HEARING SCHEDULE AND RELATED DEADLINES BY
BY ALLIANCE FOR NUCLEAR RESPONSIBILITY**

Pursuant to Rule 11.1(e) of the Commission's Rules of Practice and Procedure, Intervenor Alliance for Nuclear Responsibility ("A4NR") hereby files this Reply to the *Joint Motion to Extend Hearing Schedule and Related Deadlines by the Office of Ratepayer Advocates, The Utility Reform Network and Pacific Gas and Electric Company (U39M)* ("Joint Motion"), filed in the above-captioned docket on June 20, 2016. A4NR supports the motion almost in its entirety, but requests one accommodation regarding the date proposed for the filing of reply briefs.

The Joint Motion proposes reply briefs be filed on October 17, 2016, whether this matter proceeds to evidentiary hearings or is settled. Due to conflicts with personal vacation schedules, including the absence of A4NR counsel from the country at the time of the filing of opening briefs and reply briefs, A4NR would request leave to file its reply brief on or about October 25, 2016. A4NR expects it will be able to file its opening brief timely on the date proposed despite the absence of its counsel, but would request leave to file its reply brief eight days after the date proposed for the filing of reply briefs. This would provide A4NR and its counsel ten days to review the opening briefs of other parties, and thereafter prepare, file and serve A4NR's reply brief.

///

///

///

Upon the granting of this accommodation, A4NR fully supports the Joint Motion and all other aspects of the schedule proposed by the Joint Motion.

Respectfully submitted,

/s/ Alvin S. Pak

Alvin S. Pak
Law Office of Alvin S. Pak
827 Jensen Court
Encinitas, California 92024
Telephone: 619.209.1865
Facsimile: 760.634.8403
Electronic Mail: Apak@AIPakLaw.com

Attorney for Alliance for Nuclear Responsibility

Encinitas, California
June 21, 2016

VERIFICATION BY AFFIDAVIT

I, Alvin S. Pak, hereby state that I am counsel for and, in this capacity, an authorized representative of the Alliance for Nuclear Responsibility with the authority to make this verification on its behalf. I have read the foregoing **REPLY TO JOINT MOTION TO EXTEND HEARING SCHEDULE AND RELATED DEADLINES BY ALLIANCE FOR NUCLEAR RESPONSIBILITY** and attest that the matters stated therein are true and correct to the best of my knowledge, except as to matters stated on information and belief, and as to those matters I attest that I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my information, knowledge and belief.

Executed this 21st day of June, 2016, at Encinitas, California.

/s/ Alvin S. Pak

Alvin S. Pak
Counsel and Authorized Representative of
Alliance for Nuclear Responsibility